

REMARKS

Independent claims 1 and 15 have been amended to more effectively define the scope of the claimed invention. New claims 49-54 are herein presented. No new matter is presented by these amendments.

Applicant respectfully requests reconsideration of the rejection of claims 1, 4-6, 8-15, 18-26, 39-42, 45, and 47-48 under 35 USC Section 103(a) as being unpatentable over *Rangachari et al.* (US Patent 6,470,227), in view of *Tadokoro et al.* (US Patent 6,463,352), further in view of *Tenney et al.* (US Patent 6,944,584), further in view of *Haverstock* (US 6,192,415). As discussed below, the combined teachings of these references fail to teach each and every feature of Applicant's claimed invention.

Haverstock is directed to a system for enabling access to non-HTML objects from a web browser. Specifically, *Haverstock* teaches the use of a URL which identifies an object, and "enables non-HTML actions to be identified in the URL and the action to be performed on or relating to the object" (Col. 5, lines 19-28). However, *Haverstock*'s URL is in fact distinguishable from Applicant's claimed URL for several reasons which largely stem from the fact that *Haverstock* is directed to software systems only, and teaches no relation whatsoever to a physical object of any kind.

First of all, the "objects" which are identified in *Haverstock*'s URL are software objects such as documents and databases, as *Haverstock* is directed to the retrieval and processing of virtual "objects" in response to requests from a web browser. In contrast, Applicant's claimed object field identifies a physical tool utilized in a semiconductor fabrication facility.

Second, the action identified in *Haverstock*'s URL is a software function. *Haverstock* discloses such software-related actions as opening, creating, deleting (Col. 5, line 64) and sorting (Col. 6, line 11), which only apply to software objects. In contrast, Applicant's claimed function field identifies a physical function that is to be carried out by a semiconductor processing tool. A processing tool is not subject to opening, creating, deleting, and sorting in the same manner that

a software object may be so manipulated. Thus, *Haverstock* fails to disclose a function field as claimed by the Applicant.

Third, *Haverstock's* URL is a retrieval mechanism which enables users to "retrieve [software] objects and identify actions" (Col. 5, line 42) for those software objects. The objects and/or results of the actions are retrievable through a web browser, and presented to a user through a computer system. In contrast, Applicant's URL as claimed identifies a physical tool in an object field and enables commands in a function field to be propagated to the tool, resulting in a real-world activity such as processing of semiconductor wafers. A physical tool cannot be "retrieved" through a web browser, nor can the physical objects which result from an identified function carried out by such a tool (e.g. processed wafers) be presented to a user through a computer system. Thus, *Haverstock's* disclosed URL mechanism does not sufficiently relate to Applicant's claimed invention, as its application in an attempt to produce the claimed invention yields nonsensical results.

Moreover, the combination of *Haverstock's* teachings with those of *Tadokoro* fails to disclose, prima facie, the functional aspect of Applicant's claimed invention for which these references are cited. As discussed above, *Haverstock* teaches retrieval of virtual objects and actions carried out on those virtual objects. *Tadokoro* teaches a database server which "maintains a database of descriptive information describing the instrumented cutting machines and that is responsive to queries" (Col. 4, lines 47-49). *Tadokoro's* database is merely an intermediate monitoring component that facilitates transmission of cutting machine status information that is requested in a query. Thus, the combination of *Haverstock* and *Tadokoro* merely yields a data-retrieval mechanism that enables one to retrieve status information, and identify an action in a URL to be performed on that status information. As such, the cited references in combination fail to teach a system capable of effecting a physical activity carried out by a processing tool as designated in fields of a URL.

Additionally, the Examiner states that *Tadokoro* discloses hyperlinks for controlling a machine which indicate what function is to be performed by the machine tool. However, Applicant's claims are not directed to a hyperlink that loosely relates to controlling a machine

and merely indicating what function is to be performed. Rather, Applicant's claimed invention comprises the actual use of a URL to transmit object and function information to cause initiation of action by a semiconductor processing tool. Moreover, *Tadokoro* merely teaches a "job order user interface (UI) routine" (Col. 26, line 26), which produces a web form for a user to enter job order data. The hyperlinks disclosed in fact produce *additional user interfaces* for further data entry (Col. 26, lines 49-59). Thus, the hyperlinks as taught by *Tadokoro* do not actually control the machine tools, but rather require a user to navigate additional forms and pages in order to enter data. It is precisely this type of form-based complexity which is alleviated by the Applicant's claimed invention, in which object and function information is embedded in a URL.

Finally, Applicant has amended independent claims 1 and 15 to include the features of awaiting an initiate processing acknowledge from the tool, and upon receipt of the initiate processing acknowledge from the tool, awaiting an event report from the tool indicating completion of the action. Support for these amendments may be found, by way of example only, in the as-filed specification at page 29. These features further define the relationship and functionality of the physical processing tool and the tool server apparatus, and are not taught by the prior art of record. Additionally, Applicant herein presents new claims 49-54 for consideration, these claims being directed to the inclusion of an override process for objects of the tool object model. Support for these claims may be found, by way of example only, in the as-filed specification at pages 33-34.

In sum, it is respectfully submitted that the claimed invention is patentable over the prior art teachings of *Rangachari*, *Tadokoro*, *Tenney*, and *Haverstock*. Applicant's claimed invention defines a non-obvious approach to the management and control of physical transport and processing tools for semiconductor wafers. Therefore, withdrawal of the rejection and passage of claims 1 and 15 to allowance is respectfully requested. Claims 4-6, 8-15, 18-26, 39-42, 45, and 47-48 depend from newly amended claims 1 and 15, and are allowable by virtue of their dependence.

Conclusion

In view of the foregoing amendments to the claims and the above remarks, the Office is respectfully requested to withdraw the Section 103(a) rejections, and is requested to consider the newly amended claims as overcoming the teachings of *Rangachari*, *Tadokoro*, *Tenney*, and *Haverstock*.

A Notice of Allowance is respectfully requested. If any questions remain, the undersigned can be contacted at (408) 749-6903.

If any additional fees are missing or due, please charge to **Deposit Account No. 50-0805** (Order No. ASTGP123).

Respectfully submitted,
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